

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Graettinger -Terril Comm School District (25560000)
Dates of Review: November 8 – 10, 2016

Program Year: 2017
Month of Review: September
Lead Reviewer: Christine Crow
Org Representative(s): Jane Brown

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	The denial letter is not provided to families who complete an income application and are over the income guidelines. Households who are denied free or reduced price meal benefits must be notified in writing by using the prototype letter for notification of denial or a letter for notification of denial that was approved by the state office. Best practice is to keep a copy of the denial letter sent to each household.	Describe who will be responsible for notifying households that are denied benefits and for maintaining documentation. Submit a copy of the letter to be sent.	
100 - Certification and Benefit Issuance	V-0100	Upon review, State Agency found 6 income applications (12 students) that did not contain either the last four digits of the applicants social security number or a check in the box indicating that the applicant does not have a social security number. The application contained all other required elements. Technical assistance provided to staff on this requirement. The list of students whose applications are missing this information is provided in a list located in review attachments and in the SFA-1.	Submit completed copies of the 6 applications listed that contain all of the required elements, including the last four digits of the applicants social security number. Attach the copies in the IowaCNP. Do not email or fax.	
300 - Meal Counting and Claiming	V-0300	No documentation was available to show that cashiers at either school received any training on what constitutes a reimbursable meal, offer versus serve or other job responsibilities. Although the cashier at the middle and high school had civil rights training, the cashier at the elementary school does not have civil rights training. Four hours of training for cashiers is required annually and must include civil rights training as well as training on what constitutes a reimbursable meal.	Send documentation of training, agenda, and staff signatures for cashiers at both schools and the civil rights training for the cashier at the elementary school.	
1000 - Local School Wellness Policy	V-1000	The public does not have access to the most recent assessment on the implementation of the Local School Wellness Policy as required.	Submit a description of the district's plan on how it will make the assessment on the implementation of the Local School Wellness Policy available to the public.	

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1000 - Local School Wellness Policy	V-1000	The Local School Wellness Policy must include a policy for foods and beverages not sold to students and include a policy for food and beverage marketing. Technical assistance provided on all required elements of the Local School Wellness Policy. School wellness resources and sample policies provided.	Describe the districts plan and timeline to include those items in the policy.	
1100 - Smart Snacks	V-1100	There is a vending machine located in the library of the middle and high school. The food and beverage items sold in the vending machine meet Smart Snack requirements for the 9-12th grade students. The 6-8 grade students have access to this vending machine immediately after school is over and the beverages included in the vending do not meet Smart Snack requirements for this grade group. If 6-8th grade students have access to this machine during the defined school day (defined as 12 am on a day of instruction to 30 minutes after the end of the official school day) all items must meet the Smart Snack requirements for the 6-8th grade students.	Describe how the School Food Authority will ensure that all foods and beverages located within the vending machine meet requirements for all of the grade groups who have access to the vending during the defined school day.	
1200 - Professional Standards	V-1200	All districts participating in school nutrition programs must have a food service director who is responsible for nutrition and menu planning, food safety, employee safety, food production, procurement, program accountability, and personnel management and training. Although a food service director was listed on the School Nutrition Program application, while on-site, it was not clear who the food service director was for the Graettinger-Terri Community School District. The assigned food service director must have 12 hours of professional standards training annually.	Describe who will be the food service director for the Graettinger-Terri Community School District.	
1200 - Professional Standards	V-1200	There was no documentation to show that the food service manager at the elementary school received any training other than the civil rights training. School Nutrition Managers are required to have a total of 10 hours annual training applicable to the position.	Submit the plan that describes how the school nutrition manager at the elementary school will obtain 10 professional standard training hours. Include training topics and the number of hours that they will provide and the date that the training will take place.	
1200 - Professional Standards	V-1200	Some of the full time nutrition staff did not have any training documentation on file to show that they received the required number of hours. Full time school nutrition staff must have 6 hours of training annually.	Describe the plan, including the topics of training and their professional standard hours that will be provided and the date trainings will take place for the full time food service staff to obtain the required 6 hours of training this school year.	
1200 - Professional Standards	V-1200	Every School Food Authority (SFA) must have a system to track training of all staff with school nutrition responsibilities. Training logs should include: employees name, position, title of training, KEY Area (refer to learning objectives) training topics, date training completed, and	Submit a written plan that describes how and who will be documenting and tracking the training for school nutrition staff. Attach a copy of training documentation completed for this school year.	

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		creditable training hours. Technical assistance provided to the food service director.		
1200 - Professional Standards	V-1200	All employees working with school nutrition need documented training hours for professional standards requirements. Cashiers working Point of Sale (POS) only, must receive training applicable to their job such as cashier training, identifying a Reimbursable Meal, Offer versus Serve and Civil Rights. The cashier at the middle and high school had Civil Rights training only and the cashier at the elementary school did not have documentation of any previous training.	Submit a written plan, including a timeline and topics of training, to assure that all cashiers will receive training for this school year.	

Site - Level Findings: Graettinger-Terril Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Breakfast	V-0300	During the observed breakfast, there were 6 students that were counted as having a reimbursable meal even though they did not have all 3 items and/or a ½ cup fruit. This group of students went through the point of service line quickly which did not allow the cashier adequate time to properly count meals or redirect students back to the line to obtain the required items. Potential fiscal action is possible, dependent on the amount of fiscal action taken for other errors. At this time, the total fiscal action is unlikely to be greater than the \$600 disregard.	Describe how the point of service process for breakfast at the elementary school will change to ensure that all students going through the breakfast line will receive a reimbursable meal, be charged for an a la carte item or be redirected back to the line to obtain the required items needed to make a reimbursable meal.	
400 - Meal Components and Quantities - Breakfast	V-0400	Signage is required for both breakfast and lunch to ensure students (and staff) are aware of what is available at that meal and how a reimbursable meal can be made.	Describe where the breakfast signage will be posted and who is responsible for daily updates of the sign.	
400 - Meal Components and Quantities - Breakfast	V-0400	On 9/20/16, according to the menus and food production records, grains were not offered at breakfast. Documentation described serving an egg omelet, fruit, fruit juice, and milk. All three components, grains, fruit and milk must be offered at breakfast. Since the grain component was missing, the meal cannot be claimed. Potential fiscal action is possible, dependent on the amount of fiscal action taken for other errors. At this time, the total fiscal action is unlikely to be greater than the \$600 disregard. Although it was listed on the menu, the food production records for breakfast must also include milk and specify what type of fruit and juice are offered. Technical assistance provided.	Submit one week of breakfast food production records, menus, and other supporting documents to prove that meals served contain all of the required components and food production records are complete with all required information.	
400 - Meal Components and Quantities - Lunch	V-0400	On 9/23/16, per the menu and food production record, grains were not offered at lunch. A reimbursable meal must consist of all 5 components, including grains, meat/meat	Submit one week of lunch food production records, menus and supporting documents to show that all five components are included in all meals, that all required portions of all vegetable subgroups are	

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		<p>alternate, milk, fruit, and vegetable. If a required component is missing the meal is not reimbursable and cannot be claimed. Potential fiscal action is possible, dependent on the amount of fiscal action taken for other errors. At this time, the total fiscal action is unlikely to be greater than the \$600 disregard.</p> <p>In addition to listing all of the menu component items to be offered, food production records must contain the total quantity of food to be prepared for all planned portions for each menu item documented in a measurable amount. The food production records submitted for the review period did not always contain the total amount prepared documented in a measurable amount (pounds, ounces, cups etc.), thus making it unclear if enough food was prepared to meet the planned number of servings. Also during the week of the review period, the other vegetable subgroup quantity offered did not meet the required amount. One half cup is required to be offered for the week and only 1/4 cup of vegetables in the other subgroup was offered. Not all grains served, as found on the labels submitted for the review period, are whole grain rich. The rice krispies cereal, baked split top wheat bread and the breading on the chicken breast patty are not whole grain rich. 100% of grains served must be whole grain rich. Technical assistance provided.</p>	<p>offered and the food production records include the total amounts prepared written in a measurable amount. Describe how staff will ensure that 100% of grains offered are whole grain rich and submit the whole grain rich bread label that the SFA will begin using.</p>	
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Org - Level Technical Assistance

Area	Question	Comments
		The SFA's Procurement Plan should include documentation through the debarment statement to show that the SFA confirmed the vendor(s) is in good standing to do business with the federal government. It must also contain language that describes the oversight to ensure that contractors perform in accordance with terms, conditions, and specification of their contracts or purchases. Technical assistance provided.
100 - Certification and Benefit Issuance	126 Are the correct conversion factors used when processing applications that indicate more than one income frequency? If NO, explain.	In the determination of eligibility status, all income applications were converted to annual income even when the income reported has only one frequency. Income is only converted to annual income when income reported on the application is more than one frequency.
200 - Verification	208 a. Did the SFA attempt to directly verify selected applications?	One of the applications to be verified was free eligible. Before sending the letter to the household informing them that they have been selected for verification, the SFA should attempt to directly verify the student by looking for their name on E-lookup. If found in E-lookup, the student would be directly verified to receive free meal benefits.

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800 - Civil Rights	805 How are students with special dietary needs accommodated?	If any students have special dietary needs, the Diet Modification Request Form must be completed by the student's prescribing official in order for non-allowable foods to be purchased from the school food service account and for meals to be counted and claimed even though they may not contain all components that are required in a reimbursable meals. The diet modification form can be found on the following website: https://www.educateiowa.gov/pk-12/nutrition-programs/national-school-lunch-program
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	Beginning in the 2016-2017 school year, the school food authority must complete an on-site monitoring review for breakfast for 50% of the schools within the district, once every 2 years by February 1st. Technical assistance provided.

Site - Level Technical Assistance Graettinger-Terril Elementary School (0409)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation, did all reviewed meals during the review period indicate that all of the required meal components per weekly meal pattern requirements were offered and served to students? If NO, explain any errors identified and the technical assistance provided. Indicate whether the violations identified were repeat violations for the SFA. Record the number of meals observed missing required meal components on the S-1, 15. Record only the number of incomplete meals claimed for reimbursement that will be subject to fiscal action in the appropriate field on S-1, 16.	The standardized recipes submitted for the review period were not individualized to the schools serving needs. All recipes must be standardized and individualized to the school's needs including servings used and amounts of ingredients needed to meet those needs. Technical assistance offered.

Org - Level Commendations

Description
Certification and Benefit Issuance: All income applications were approved within 10 days of receiving the completed application. Income applications are complete with received date, parent signature and date, determining official signature and date, and eligibility determination. All applications are approved for the correct benefit status and transferred accurately to the POS. Direct certification lists and e-look up lists are downloaded, printed, and filed. Benefits are extended to all students within the household. The ethnic/racial form was completed on time, was accurately completed and no discrimination was observed.
Civil Rights: No discrimination was observed while on site and staff were very courteous to their customers. Civil rights training documentation showed that all nutrition staff receive the required training annually. The "And Justice for All" civil rights poster is posted in a public location. The current nondiscrimination statement was located on all documents. The public release was sent to the local newspaper.
Food Safety: A HACCP Plan was available at both schools, staff were following the standard operating procedures within the plan, and good food safety practices were observed. Two food service inspections had taken place and the documentation of findings were on display in a public location. Temperature logs are up to date and available for milk coolers, food, refrigerators, and freezers. The food service director and manager have both attended a ServSafe course.
Local School Wellness Policy: The wellness committee is very active and consists of a variety of members including teachers, administrators, school nutrition staff, school staff, parents, students and members of the general public. Weekly wellness newsletters are made available as hard copy handouts located throughout each school and through the school's website. The Local School Wellness Policy is online and made available to the public as required. The wellness committee monitors each school's progress towards meeting the goals of the wellness policy. The Local School Wellness Policy and the progress report are assessed at least every 3 years as required.
Meal Counting and Claiming: The edit checks are completed and on file to ensure that the students who are being claimed do not exceed the total number of students enrolled as free, reduced price or paid. The number of students who were counted and claimed at lunch and breakfast were reasonable with the average number of students who participate in meals. Offer versus serve is available for students at both the elementary, middle and high school. All students at the observed lunch that were counted and claimed had a reimbursable meal.

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Nutritional Quality and Meal Patterns: Daily dated food production records and menus are available for all meals claimed. Meat/meat alternate, all vegetable subgroups, fruit, and milk were offered at all breakfast and lunch meals. Many menu items are homemade and have standardized recipes as required. CN labels are also available for most items. Signage is available for the lunch meal to inform students and staff of what a reimbursable meal for that particular day consists of. Posters were on display throughout the lunch room promoting healthy foods and physical activity. Three types of approved milk are offered. Good team work was observed at the elementary school and staff were pleasant and helpful to their student customers.

On-Site Monitoring: The on-site monitoring review form was completed for both the schools for lunch by February 1st.

Procurement: The School Food Authority (SFA) has a procurement plan and a standards of conduct policy. The SFA has their documentation on file for all bids sent and received. The SFA belongs to a purchasing group and had the appropriate documentation to show the purchasing group properly procured their primary vendor. The SFA follows the Buy American provision.

Reporting and Recordkeeping: All School Nutrition Program documents are kept for three years plus the current year.

Resource Management: The non-program revenue tool using 2015-2016 data shows that the revenue generated from non-program foods contributes adequately to total revenue. The non-profit school food service account balance does not exceed the three-month operating balance.

School Breakfast and Summer Food Service Outreach: The School Food Authority provides outreach to families informing them of the breakfast program and the summer food service program.

Verification: Verification and the verification report were completed by 11/15/16 as required. The approved letters of notification for verification and letter of determination of verification were provided to the selected families. The correct number of applications have been selected for verification, they were confirmed by the confirming official prior to notifying families and they were correctly verified for the eligibility status.